

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

YEON MOOK CHOI, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:17-cv-552-LMB-MSN
)	
YOUNG CHUL YOON, et al.,)	
)	
Defendants.)	
)	

DEFENDANTS' SECOND RULE 68 OFFER OF JUDGMENT

Pursuant to Rule 68 of the Federal Rules of Civil Procedure ("Rule 68"), Defendants Young Chul Yoon, Procon Enterprise, Inc., Procon Electric, Inc., Peter Kim, and Eastern Corporation offer to allow judgment to be taken against them, jointly and severally, and in favor of Plaintiff Gijoong Ko, individually, in this action for back wages in the sum of eight thousand four hundred twenty-three dollars and thirty-three cents (\$8,423.33), as outlined in Defendants' Second Rule 68 letter dated November 17, 2017.

Additionally, Defendants further offer pursuant to Rule 68 to allow the judgment to be taken against them in this action to include an additional sum for reasonable attorneys' fees and taxable costs incurred by Plaintiff Gijoong Ko, individually, in this action. Accordingly, this offer is intended to constitute full and complete satisfaction of each and all of Plaintiff's claims for relief against Defendants in this action.

This Offer of Judgment is made solely for the purposes specified in Rule 68, and is not to be construed either as an admission that the Defendants are liable in this action, that they

violated any statutes or regulations, or that the Plaintiff has suffered any damages as a result of the Defendants' action.

If Plaintiff does not serve a written notice accepting this offer within the time required under Rule 68, this offer will be considered withdrawn without further notice.

This Offer of Judgment is made for the purposes set out in Rule 68. This offer applies to all claims for relief asserted against Defendants. This Offer of Judgment, if accepted, will not be admissible except in a proceeding to determine costs in accordance with Rule 68.

Respectfully submitted,

YOUNG CHUL YOON, *et al.*
By Counsel

/s/

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2017, a true and correct copy of the foregoing was served by electronic mail and facsimile to:

Hyunkweon (Michael) Ryu
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Counsel for Plaintiffs

_____/s/
Jayna Genti, Esq.